

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

In re Application of
G+ Communications LLC,
Applicant,
For An Order Pursuant To
28 U.S.C. § 1782 To Conduct Discovery For
Use In A Foreign Proceeding

Civil Action No. 2:22-MC-3

**NOTICE OF INTENT TO INTERVENE AND OPPOSE EX PARTE APPLICATION
FOR ORDER FOR DISCOVERY FROM SAMSUNG ELECTRONICS AMERICA, INC.
FOR USE IN A COURT PROCEEDING IN BRAZIL PURSUANT TO 28 U.S.C. § 1782**

By and through this submission, Samsung Electronics America, Inc. (“SEA”) hereby provides notice that it intends to intervene in the above captioned action to oppose entry of an order for discovery against it for use in Case No. 0081472-49.2022.8.19.0001, and its corresponding Interlocutory Appeal No. 0031565-11.2022.8.19.0000, pending in Brazil. Among other issues, the discovery sought by Applicant is an attempt to circumvent foreign proof-gathering restrictions and other policies of Brazil. *See Intel Corp. v. Advanced Micro Devices, Inc.*, 542 U.S. 241, 265 (2004).

SEA informed counsel for Applicant of its intent to intervene and object, and indicated that it will file papers within two weeks of the submission of this notice. Absent direction otherwise from the Court, SEA will proceed accordingly.

Dated: June 16, 2022

Respectfully submitted,

/s/ *Melissa Richards Smith*

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Counsel for Intervenor
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CERTIFICATE OF SERVICE

This is to certify that on June 16, 2022, a true and correct copy of the foregoing instrument was delivered to all counsel of record through the court electronic system.

/s/ Melissa Richards Smith _____